

Kevin Ventura
Reg. No. 70750-054
U.S. Penitentiary Canaan
P.O. Box 300
Waymart, Pennsylvania 18472

December 2, 2020

Office of the Clerk
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Application granted. SO ORDERED.

New York, New York
December 17, 2020

/s/ John G. Koeltl
John G. Koeltl, U.S.D.J.

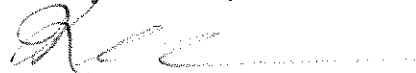
Re: Ventura v. USA, Civil No. 1:20-cv-08064-JGK
Crim. No. 1:09-cr-01015-JGK

Dear Sir/Madam:

Enclosed for filing in this matter please find the original and one (1) copy of Morant's Motion for Enlargement of Time within which to File Memorandum of Law in Support of Motion Under 28 U.S.C. § 2255 to Vacate, SET Aside, or Correct Sentence by a Person in Federal Custody.

Thank you very much.

Very truly yours,



Kevin Ventura

Encls.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

KEVIN VENTURA,

Plaintiff,

v.

UNITED STATES OF AMERICA,

Respondent.

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Civil No. 1:20-cv-08064-JGK

Crim. No. 1:09-cr-01015-JGK

Hon. John G. Koeltl

MOTION FOR ENLARGEMENT OF TIME WITHIN WHICH TO
FILE MEMORANDUM OF LAW IN SUPPORT OF MOTION UNDER
28 U.S.C. § 2255 TO VACATE, SET ASIDE, OR CORRECT
SENTENCE BY A PERSON IN FEDERAL CUSTODY

NOW COMES Movant Kevin Ventura ("Movant"), acting pro se, and moves this Honorable Court for a sixty (60) day enlargement of time, up to and including until February 9, 2021, within which to file his memorandum of law in support of his previously-filed Section 2255 motion.

In support of this motion Movant submits the following.

1. On November 23, 2020, USP Canaan was placed under total lockdown due to discovery of an outbreak of Covid-19 in one of the inmate housing units. See Memorandum for Inmate Population, attached hereto

as Exhibit A (this memo, however, which reports ten positive cases in one of the housing units, is somewhat dated, as positive Covid cases have now been identified in several of the housing units, including Morant's housing unit, affecting well over 100 inmates and several staff members).

2. Based upon the extraordinary circumstances described above, Morant needs additional time to complete his memorandum of law in support of his Section 2255 motion.

WHEREFORE, Morant prays this motion will be granted.

Respectfully submitted,



Kevin Ventura

Reg. No. 70750-054

U.S. Penitentiary Canaan

P.O. Box 300

Waymart, Pennsylvania 18472

Date: 12/02/2020

EXHIBIT A



U. S. Department of Justice
Federal Bureau of Prisons

USP Canaan
3057 Eric J. Williams Memorial
Drive
Waymart, PA 18472

November 24, 2020

MEMORANDUM FOR INMATE POPULATION

FROM:

A handwritten signature in black ink, appearing to read "E. Bradley".

E. Bradley, Warden

SUBJECT: Coronavirus Update

Ten positive inmate cases have been identified in one of our general population housing units. Medical staff have initiated testing procedures to identify others who could be infected.

Until we have a better understanding of the number and location of current active cases, we will remain locked down. Please notify staff if you have symptoms associated with COVID-19.

Additional information will be provided.

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U. S. Department of Justice

Federal Bureau of Prisons

USP Canaan

3057 Eric J. Williams Memorial Drive
Waymart, PA 18472

November 30, 2020

MEMORANDUM FOR: THE INMATE POPULATION

FROM:

A handwritten signature in black ink, appearing to be "E. Bradley", is written over the "FROM:" label and extends into the "SUBJECT:" line.

E. Bradley, Warden

SUBJECT:

COVID-19 Updates

Due to positive inmate cases identified in F1, F2, B2, and D1 housing units, movement will be limited. We are currently monitoring the inmate population and symptom checking. Care kits are being handed out to all inmates to include hygiene and sanitation items. Please report any symptoms to medical staff.



U. S. Department of Justice

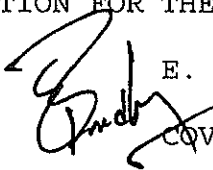
Federal Bureau of Prisons

USP Canaan

*3057 Easton Turnpike
Waymart, PA 18472*

December 2, 2020

NOTIFICATION FOR THE INMATE POPULATION

FROM:  E. Bradley, Warden

SUBJECT: COVID Update

As all of you are aware, we have identified multiple cases of COVID-19 at USP Canaan. Confining you in your cells is not what any of us want. However, Medical staff are concerned this outbreak could lead to additional transmissions. The Executive Staff are not utilizing this quarantine status for disciplinary reason, but rather for your safety to mitigate the virus.

The last several months have been a challenge for all of us. Unfortunately, this has resulted in the suspension of many routine activities, leading up to our current quarantine status. Our focus has been to return to normal as soon as possible. We have discussed a shower plan, and providing a way to maintain communication with your families. Staff will begin issuing stamps to each of you this week. The distribution of limited commissary is also something we are discussing for the near future.

I can assure you that both staff and inmate safety is our main focus as we try to make it through this Pandemic.

CERTIFICATE OF SERVICE

It is hereby certified that a true and correct copy of the foregoing was sent, via first-class prepaid mail, this 2nd day of December, 2020, to the following counsel for the Government:

Mr. Micah W.J. Smith
Assistant United States Attorney
Southern District of New York
One St. Andrew's Plaza
New York, NY 10007-1703

A handwritten signature in black ink, appearing to read 'Kevin Ventura', written over a horizontal line.

Kevin Ventura